

471. The Group Plaintiffs have members whose children play in and around McKinstry Brook and its wetlands near and downstream of where Wetlands A, Z, and I empty into McKinstry Brook.

472. The Group Plaintiffs have members who have observed discoloration and other signs of pollution in McKinstry Brook and its wetlands downstream of Wetlands A, Z, and I, including brown and/or orange discoloration, which can be attributable to iron pollution.

473. The Group Plaintiffs have members who are concerned that McKinstry Brook and its wetlands have been polluted by discharges from the Landfill. Their enjoyment derived from activities in and around McKinstry Brook and its wetlands is diminished knowing that these waterways are polluted.

474. The Group Plaintiffs have members who are concerned about their health and safety, and the health and safety of their children, as a result of having spent time in the presence of pollutants discharged by the Landfill to McKinstry Brook and its wetlands.

475. The Group Plaintiffs have members who are concerned that the health of aquatic life and other wildlife in and around McKinstry Brook and its wetlands has been negatively impacted by the presence of pollutants discharged by the Landfill.

476. The Group Plaintiffs have members who spend less time in and around McKinstry Brook and its wetlands than they otherwise would because they are aware that the Landfill illegally discharges pollutants to these waterways.

COUNT 2: RCRA IMMINENT AND SUBSTANTIAL ENDANGERMENT

477. Paragraphs 1 - 321 are hereby re-alleged and incorporated by reference herein.

478. The Group Plaintiffs and the Individual Plaintiffs bring Count 2 against all Defendants.

479. As set out below, Defendants' past and present handling, storage, treatment, transportation, and/or disposal of solid and hazardous waste at the Landfill – specifically, the construction and operation of the Landfill in a way that allows toxic pollutants to be released from Landfill cells and to contaminate drinking water aquifers for residential wells in Charlton and Sturbridge, and the operation of the Landfill in a manner that allows the contamination to continue and to worsen – has created, and is exacerbating, an imminent and substantial endangerment to health or the environment within the meaning of RCRA.

i. RCRA “Imminent and Substantial Endangerment” Actions

480. The objectives of RCRA are “to promote the protection of health and the environment and to conserve valuable material and energy resources.” 42 U.S.C. § 6902(a).

481. RCRA seeks to achieve the above objectives in part by “assuring that hazardous waste management practices are conducted in a manner which protects human health and the environment.” *Id.* § 6902(a)(5).

482. RCRA authorizes citizens to commence an action against any person “including any past or present generator, past or present transporter, or past or present owner or operator of a treatment, storage, or disposal facility, who has contributed or who

is contributing to the past or present handling, storage, treatment, transportation, or disposal of any solid or hazardous waste which may present an imminent and substantial endangerment to health or the environment.” Id. § 6972(a)(1)(B).

483. RCRA grants jurisdiction to United States District Courts “to restrain any person who has contributed or who is contributing to the past or present handling, storage, treatment, transportation, or disposal of any solid or hazardous waste [which may present an imminent and substantial endangerment to health or the environment], . . . to order such person to take such other action as may be necessary, or both,” and to award costs of litigation to citizen plaintiffs. Id. §§ 6972(a), (e).

484. RCRA defines “disposal” as “the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.” Id. § 6903(3).

485. RCRA defines “solid waste,” as “any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities,” *excluding* “domestic sewage,” “irrigation return flows,” “industrial discharges which are point sources subject to permits under [the CWA],” and “source, special nuclear, or byproduct material as defined by the Atomic Energy Act.” Id. § 6903(27).

486. RCRA defines “hazardous waste” as “a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may—(A) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.” Id. § 6903(5).

ii. Charlton Aquifer Contamination

487. The Landfill’s contamination of drinking water aquifers in the area of No. Ten Schoolhouse Road, Berry Corner Road, H Foote Road, and Eleanor Lane in Charlton (the “Charlton Aquifers”) presents, and will continue to present, an imminent and substantial endangerment to health and the environment.

a. Charlton Residential Well Monitoring

488. Two permits issued by DEP to the Landfill – the Plan for Final Closure of Landfill Phases I-VII.1A, dated July 2, 2014 and the Authorization to Construct in Existing Landfill, dated October 24, 2012 – require the monitoring of private drinking water wells within one-half mile of Phase VII of the Landfill.

489. Pursuant to the IRA Plan submitted to DEP by Tighe & Bond on behalf of SRDP and the Town, consultants retained by Casella, SRDP, and/or the Town collect samples from residential wells in Charlton and test those samples for organic and inorganic pollutants.

490. Tighe & Bond reports the results of Charlton residential well sampling in IRA Status Reports, submitted to DEP each calendar quarter.

491. These IRA Status Reports confirm that at least forty-five residential wells in Charlton contain, or have contained, 1,4-dioxane, trichloroethylene, chlorobenzene, 1,1-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, toluene, chloroform, benzene, naphthalene, lead, and/or arsenic.

492. The IRA Status Reports to DEP also describe activities undertaken by Casella, SRDP, and/or the Town in response to contaminants identified in Charlton residential wells. These activities include, but are not limited to, the provision of bottled water to some Charlton residents with contaminated residential wells and the installation of water treatment systems for some others.

493. Each water treatment system installed by or on behalf of Casella, SRDP, and/or the Town is a point-of-entry ("POET") system, meaning that it is installed on the source line from the well to the residence, ahead of taps, faucets, and other water outlets.

494. Each POET system installed by or on behalf of Casella, SRDP, and/or the Town consists of two fifty-pound granular activated carbon vessels.

495. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and arsenic concentrations in samples collected from the residential well at 74 No. Ten Schoolhouse Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L	Arsenic Concentration (µg/L) MMCL = 10 µg/L
495a	9/24/15	0.05*	ND
495b	9/25/15	ND	6

496. In Appendix E to the 2013 Water Quality Evaluation, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations

in samples collected from the residential well at 74 No. Ten Schoolhouse Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L
496a	10/19/12	0.26

497. 74 No. Ten Schoolhouse Road is located approximately three quarters of a mile north/northeast of the Landfill.

498. 74 No. Ten Schoolhouse Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

499. In the May 2017 IRA Status Report, Tighe & Bond reported an arsenic concentration of 2 µg/L in a sample collected on September 25, 2014 from 135 Berry Corner Road in Charlton.

500. 135 Berry Corner Road is located approximately two thirds of a mile north/northeast of the Landfill. It is the home of the Joy family, Individual Plaintiffs in this case.

501. 135 Berry Corner Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

502. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations in samples collected from the residential well at 148 Berry Corner Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L
502a	1/25/16	0.11*
502b	2/8/16	0.11*

502c	3/18/16	0.114*
502d	4/21/16	0.09*
502e	5/24/16	0.095*

503. In the May 2017 IRA Status Report, Tighe & Bond also reported a lead concentration of 6 µg/L and an arsenic concentration of 10 µg/L in a sample collected on September 29, 2016 from the residential well at 148 Berry Corner Road.

504. 148 Berry Corner Road is located approximately two thirds of a mile north/northeast of the Landfill. It is the home of the Lodder family, Individual Plaintiffs in this case.

505. 148 Berry Corner Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

506. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations in samples collected from the residential well at 149 Berry Corner Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L
506a	9/25/15	0.12*
506b	1/22/16	0.09*
506c	3/18/16	0.125*
506d	4/18/16	0.105*

507. In the May 2017 IRA Status Report, Tighe & Bond also reported a lead concentration of 3 µg/L in a sample collected on September 25, 2015 from 149 Berry Corner Road.

508. 149 Berry Corner Road is located approximately two thirds of a mile north/northeast of the Landfill. It is the home of Heather Mariacher, an Individual Plaintiff in this case.

509. 149 Berry Corner Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

510. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding lead concentrations in samples collected from the residential well at 150 Berry Corner Road in Charlton:

¶ No.	Sample Date	Lead Concentration (µg/L) MMCL = 15 µg/L	Arsenic Concentration (µg/L) MMCL = 10 µg/L
510a	9/26/13	ND	9
510b	9/29/16	10	15
510c	11/10/16	1.4	ND

511. 150 Berry Corner Road is located approximately two thirds of a mile north/northeast of the Landfill. It is the home of the Coleman family, Individual Plaintiffs in this case.

512. 150 Berry Corner Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

513. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding toluene, chloroform, lead, and arsenic concentrations in samples collected from the residential well at 151 Berry Corner Road in Charlton:

¶ No.	Sample Date	Toluene Concentration (µg/L) MMCL = 1000 µg/L	Chloroform Concentration (µg/L) ORSG = 70 µg/L	Lead Concentration (µg/L) MMCL = 15 µg/L	Arsenic Concentration (µg/L) MMCL = 10 µg/L
513a	8/28/13	18.7	ND	7.4	12.8
513b	4/19/16	0.28*	0.11*	ND	ND
513c	5/18/16	0.33*	ND	ND	ND
513d	6/27/16	0.19*	ND	ND	ND
513e	7/28/16	0.28*	ND	ND	ND
513f	9/28/16	ND	ND	1.1	1.7

514. 151 Berry Corner Road is located approximately two thirds of a mile north/northeast of the Landfill.

515. 151 Berry Corner Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

516. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane, lead, and arsenic concentrations in samples collected from the residential well at 161 Berry Corner Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L	Lead Concentration (µg/L) MMCL = 15 µg/L	Arsenic Concentration (µg/L) MMCL = 10 µg/L
516a	9/25/14	0.07*	2	ND
516b	9/27/16	ND	1	2

517. 161 Berry Corner Road is located approximately one half mile north of the Landfill. It is the home of Sarah Gervais, an Individual Plaintiff in this case.

518. In a November 21, 2016 letter, Tighe & Bond informed Sarah Gervais that chloroform was detected at a concentration of 3.6 µg/L in a sample collected on September 27, 2016 from the residential well at 161 Berry Corner Road. This detection is not included in any IRA Status Report to DEP.

519. 161 Berry Corner Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

520. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations in samples collected from the residential well at 181 Berry Corner Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L
520a	9/26/13	0.05*

521. 181 Berry Corner Road is located approximately one half mile north of the Landfill. It is the home of the Westbury family, Individual Plaintiffs in this case.

522. 181 Berry Corner Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

523. In the February 2016 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding toluene concentrations in samples collected from the residential well at 34 H Foote Road in Charlton:

¶ No.	Sample Date	Toluene Concentration (µg/L) MMCL = 1000 µg/L
523a	1/7/16	0.15*

524. 34 H Foote Road is located approximately two thirds of a mile northeast of the Landfill. It is the home of the Burdett family, Individual Plaintiffs in this case.

525. 34 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

526. 34 H Foote Road does not have a POET treatment system installed.

527. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and arsenic concentrations in samples collected from the residential well at 50 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L	Arsenic Concentration (µg/L) MMCL = 10 µg/L
527a	9/26/14	ND	6
527b	11/2/15	0.2*	ND

528. 50 H Foote Road is located approximately one half mile northeast of the Landfill.

529. 50 H Foote Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

530. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations in samples collected from the residential well at 53 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L
530a	11/3/15	0.12*
530b	1/25/16	0.07*
530c	3/18/16	0.0975*

531. 53 H Foote Road is located approximately one half mile northeast of the Landfill.

532. 53 H Foote Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

533. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding CVOC concentrations in samples collected from the residential well at 54 H Foote Road in Charlton:

¶ No.	Sample Date	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL= 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL= 70 µg/L
533	7/27/16	0.25*	0.57	0.38*	0.31*	0.41*

534. In the May 2017 IRA Status Report, Tighe & Bond also reported a chloroform concentration of 0.34* µg/L for a sample collected on October 19, 2016 from the residential well at 54 H Foote Road.

535. 54 H Foote Road is located approximately one half mile northeast of the Landfill. It is the home of the Mahan/Newton family, Individual Plaintiffs in this case.

536. 54 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

537. 54 H Foote Road does not have a POET treatment system installed.

538. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 58 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL= 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL= 70 µg/L	Toluene Conc. (µg/L) MMCL= 1000 µg/L
538a	11/2/15	0.18*	0.67	ND	0.9	0.52	0.91	ND
538b	1/25/16	0.1*	0.22*	0.55	0.35*	0.23*	0.43*	ND
538c	4/26/16	0.079*	0.29*	0.7	0.51	0.39*	0.66	ND
538d	7/28/16	1.27	6.1	16	8.8	5.2	11	0.15*
538e	9/28/16	ND	0.18*	0.39*	0.25*	0.18*	0.28*	ND
538f	10/11/16	ND	0.28*	0.64	0.42*	0.27*	0.48*	0.57
538g	10/28/16	ND	0.15*	0.18*	0.2*	0.12*	ND	ND
538h	11/2/16	ND	ND	ND	ND	ND	0.11*	ND
538i	12/15/16	ND	0.16*	0.33*	0.26*	0.16*	0.31*	ND
538j	1/18/17	ND	0.15*	0.3*	0.26*	0.16*	0.29*	ND

539. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding chloroform and benzene concentrations in samples collected from the residential well at 58 H Foote Road:

¶ No.	Sample Date	Chloroform Concentration (µg/L) ORSG = 70 µg/L	Benzene Concentration (µg/L) MMCL = 5 µg/L
539a	10/11/16	2	ND
539b	10/18/16	1.7	ND
539c	10/28/16	0.61*	ND
539d	11/2/16	0.38*	1.6

540. 58 H Foote Road is located approximately one half mile northeast of the Landfill. It is the home of the Shaw family, Individual Plaintiffs in this case.

541. 58 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

542. A POET treatment system was installed at 58 H Foote Road on September 27, 2016.

543. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding toluene in samples collected from the residential well at 59 H Foote Road in Charlton:

¶ No.	Sample Date	Toluene Concentration (µg/L) MMCL = 1000 µg/L
543a	7/25/16	14
543b	8/16/16	1.9
543c	9/29/16	0.76
543d	10/19/16	0.58
543e	11/16/16	0.4*
543f	12/13/16	0.47*
543g	1/24/17	0.3*
543h	2/16/17	0.34*
543i	4/12/17	0.29*

544. 59 H Foote Road is located approximately one half mile northeast of the Landfill. It is the home of the Marshall family, Individual Plaintiffs in this case.

545. 59 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

546. 59 H Foote Road does not have a POET treatment system installed.

547. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane, CVOC, and toluene concentrations in samples collected from the residential well at 65 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL= 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL= 70 µg/L	Toluene Conc. (µg/L) MMCL= 1000 µg/L
547a	9/24/15	1.5	12	26	19	9	19	ND
547b	10/28/15	2.7	12	28	17	11	21	ND
547c	11/18/15	1.46	7.6	18	11	7	13	ND
547d	12/18/15	1.07	4.9	13	7.9	4.8	9.6	0.12*
547e	1/20/16	0.88	2.9	9.6	5.1	3.4	6.7	100
547f	2/20/16	0.92	2.9	9.3	6	3.9	8.1	--
547g	3/18/16	0.874	2.3	9.2	5.5	3.4	7.2	--
547h	4/19/16	ND	ND	ND	ND	ND	ND	1.5
547i	4/21/16	0.722	2.1	9.1	5.3	3.6	7.4	2.2
547j	4/21/16	0.739	2.5	8.9	6.7	4.3	8.6	44
547k	4/22/16	0.677	1.4	4.8	4.9	2.2	6.7	14
547l	5/2/16	0.788	2.6	9	6.2	4.2	7.9	5.5
547m	5/25/16	0.823	3.2	12	7	4.6	8.9	1.6

547n	6/27/16	1.59	8.4	22	14	9.4	18	2
547o	7/28/16	2.05	10	27	15	10	19	0.72
547p	8/30/16	1.42	6.2	17	9.7	6.1	11	0.67
547q	9/28/16	1.06	5.7	16	9	5.7	11	0.78
547r	10/21/16	0.899	3.8	11	7.2	4.2	8.9*	0.42*
547s	12/19/16	0.438	1.8	5.9	3.2	2.2	4.1	0.24*
547t	1/16/17	0.601	1.6	6.1	3.2	2.3	4.3	0.18*
547u	2/7/17	0.37	1.3	5.4	3	2	4.4	0.2*
547v	2/16/17	0.58	1.2	5.7	2.9	1.9	4.1	0.19*
547w	3/2/17	0.515	1.1	5.1	3	2	4.1	ND
547x	4/13/17	0.283	0.97	4.2	2.7	1.8	3.6	0.2*

548. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding chloroform concentrations in samples collected from the residential well at 65 H Foote Road:

¶ No.	Sample Date	Chloroform Concentration (µg/L) ORSG = 70 µg/L
548a	1/20/16	4.1
548b	2/20/16	0.7
548c	3/18/16	2.7
548d	4/19/16	2.6
548e	4/21/16	1.2
548f	4/22/16	0.96
548g	5/2/16	0.31*
548h	6/27/16	0.2*

549. In the May 2017 IRA Status Report, Tighe & Bond also reported a lead concentration of 3 µg/L and an arsenic concentration of 7 µg/L in samples collected on September 25, 2015 from the residential well at 65 H Foote Road.

550. 65 H Foote Road is located approximately one half mile northeast of the Landfill.

551. 65 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

552. A POET treatment system was installed at 65 H Foote Road on November 13, 2015.

553. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and chlorobenzene detections in samples collected from the mid-point of the POET system – between the two granular activated carbon vessels – at 65 H Foote Road:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L	Chlorobenzene Concentration (µg/L) MMCL = 100 µg/L
553a	5/2/16	ND	0.11*
553b	7/28/16	ND	0.15*
553c	1/16/17	0.188	ND

554. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 66 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chlorobenzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL = 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL = 70 µg/L
554a	9/26/13	0.2*	0.8	1.3	1	0.5	0.8

554b	10/28/15	0.09*	ND	ND	ND	ND	ND
554c	7/28/16	0.839	4.7	12	7.1	5.1	8.8
554d	10/20/16	ND	0.25*	0.75	0.44*	0.26*	0.53*
554e	10/24/16	ND	ND	0.19*	ND	ND	ND
554f	10/28/16	ND	ND	0.26*	ND	ND	ND
554g	11/2/16	ND	ND	0.16*	ND	ND	ND

555. In the May 2017 IRA Status Report, Tighe & Bond also reported a naphthalene concentration of 0.1* $\mu\text{g/L}$ in a sample collected on January 7, 2016 from the residential well at 66 H Foote Road, and arsenic concentrations of 4 $\mu\text{g/L}$ and 6 $\mu\text{g/L}$ in samples collected on September 26, 2013 and September 28, 2016, respectively.

556. 66 H Foote Road is located approximately one half mile northeast of the Landfill. It is the home of the Weldon family, Individual Plaintiffs in this case.

557. 66 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

558. A POET treatment system was installed at 66 H Foote Road on October 19, 2016.

559. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and arsenic concentrations in samples collected from the residential well at 68 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration ($\mu\text{g/L}$) ORSG = 0.3 $\mu\text{g/L}$	Arsenic Concentration ($\mu\text{g/L}$) MMCL = 10 $\mu\text{g/L}$
559a	9/18/12	ND	16
559b	12/23/14	0.11*	ND
559c	9/25/15	ND	22

560. 68 H Foote Road is located approximately one half mile northeast of the Landfill. It is the home of the Jordan family, Individual Plaintiffs in this case.

561. 68 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

562. 68 H Foote Road does not have a POET treatment system installed.

563. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations in samples collected from the residential well at 70 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L)
		ORSG = 0.3 µg/L
563a	9/26/14	0.62
563b	12/23/14	0.61
563c	11/3/15	0.67
563d	4/19/16	0.438*
563e	7/28/16	0.445
563f	9/23/16	0.393
563g	10/10/16	0.539
563h	10/19/16	0.47
563i	11/21/16	0.396
563j	12/14/16	0.442
563k	1/16/17	0.403
563l	2/17/17	0.356
563m	3/15/17	0.241
563n	4/17/17	0.24

564. 70 H Foote Road is located approximately one half mile northeast of the Landfill. It is the home of the Roe family, Individual Plaintiffs in this case.

565. 70 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

566. A POET treatment system was installed at 70 H Foote Road on September 21, 2016.

567. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane detections in samples collected from the mid-point of the POET system – between the two granular activated carbon vessels – at 70 H Foote Road:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L
567a	4/17/17	0.153

568. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations in samples collected from the residential well at 72 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L
568a	9/26/13	0.07*
568b	12/23/14	0.09*
568c	10/28/15	0.11*
568d	1/25/16	0.08*
568e	3/18/16	0.114*
568f	4/21/16	0.083*

569. In the May 2017 IRA Status Report, Tighe & Bond also reported an arsenic concentration of 3 µg/L in a sample collected on September 26, 2013 from the residential well at 72 H Foote Road.

570. 72 H Foote Road is located approximately one half mile northeast of the Landfill.

571. 72 H Foote Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

572. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations in samples collected from the residential well at 73 H Foote Road in Charlton:

¶ No.	Sample Date	Chloroform Concentration (µg/L)
		ORSG = 70 µg/L
572a	10/28/15	0.58
572b	12/18/15	0.31*
572c	1/25/16	0.29*
572d	3/18/16	0.28*
572e	4/21/16	0.22*
572f	5/24/16	0.24*
572g	7/2/16	0.19*
572h	7/27/16	0.14*
572i	8/30/16	1
572j	9/27/16	3.6
572k	10/26/16	1.2
572l	11/16/16	1.4
572m	12/15/16	0.67
572n	1/18/17	0.51
572o	2/20/17	0.56

572p	3/13/17	0.52
572q	4/14/17	0.61

573. In the May 2017 IRA Status Report, Tighe & Bond also reported a 1,4-dioxane concentration of 0.11* µg/L in a sample collected on October 28, 2015 from 73 H Foote Road.

574. 73 H Foote Road is located approximately one third of a mile northeast of the Landfill. It is the home of the Metras family, Individual Plaintiffs in this case.

575. 73 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

576. 73 H Foote Road does not have a POET treatment system installed.

577. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane concentrations in samples collected from the residential well at 74 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L)
		ORSG = 0.3 µg/L
577a	12/23/14	0.07*
577b	9/25/15	0.82
577c	10/28/15	0.14*
577d	12/18/15	0.092*
577e	1/25/16	0.1*
577f	4/19/16	0.108*
577g	11/15/16	0.176*
577h	12/14/16	0.152

578. In the May 2017 IRA Status Report, Tighe & Bond also reported a lead concentration of 1 µg/L in a sample collected on September 25, 2015 from 74 H Foote Road.

579. 74 H Foote Road is located approximately one third of a mile northeast of the Landfill. It is the home of the Gallien family, Individual Plaintiffs in this case.

580. 74 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

581. 74 H Foote Road does not have a POET treatment system installed.

582. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 75 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL = 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL = 70 µg/L
582a	9/26/14	0.86	3.9	7.8	5.1	2.6	6
582b	11/2/15	0.09*	ND	ND	ND	ND	ND
582c	7/25/16	0.565	3.4	7.5	5.4	3.6	6.8
582d	8/16/16	0.625	3	2.5*	5	3.1	5.7
582e	10/11/16	0.262	1.4	1.8	2.1	1.4	2.4

583. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding chloroform concentrations in samples collected from the residential well at 75 H Foote Road:

¶ No.	Sample Date	Chloroform Concentration (µg/L)
		ORSG = 70 µg/L
583a	12/21/15	0.2*
583b	1/25/16	0.17*
583c	4/22/16	0.26*
583d	9/27/16	2.6
583e	10/11/16	1.7
583f	10/13/16	1.8
583g	10/19/16	2.7
583h	10/25/16	2.3
583i	11/2/16	1.4
583j	11/8/16	1.5
583k	12/19/16	0.74
583l	1/17/17	0.78
583m	2/15/17	0.6
583n	3/13/17	0.67
583o	4/13/17	0.71

584. In the May 2017 IRA Status Report, Tighe & Bond also reported an arsenic concentration of 5 µg/L in a sample collected on September 26, 2014 from 75 H Foote Road.

585. 75 H Foote Road is located approximately one third of a mile northeast of the Landfill. It is the home of the Bergstrom family, Individual Plaintiffs in this case.

586. 75 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

587. A POET treatment system was installed at 75 H Foote Road on October 10, 2016.

588. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 77 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL= 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL= 70 µg/L
588a	10/28/15	0.19*	ND	ND	0.58	ND	ND
588b	8/2/16	0.257	1.2	0.7	1.9	1.1	2.2
588c	10/11/16	0.164*	0.64*	0.31*	1.1*	0.68*	1.3*
588d	10/13/16	ND	0.65	ND	0.97	0.67	1.1
588e	10/18/16	ND	0.3*	ND	0.58	0.38*	0.65

589. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding chloroform concentrations in samples collected from the residential well at 77 H Foote Road:

¶ No.	Sample Date	Chloroform Concentration (µg/L) ORSG = 70 µg/L
589a	4/18/16	0.24*
589b	10/11/16	0.78*
589c	10/13/16	0.92
589d	10/18/16	0.9
589e	10/25/16	0.85
589f	11/2/16	0.48*
589g	11/8/16	0.41*
589h	12/16/16	0.36*
589i	1/18/17	0.69

589j	2/17/17	0.32*
589k	3/22/17	0.26*
589l	4/13/17	0.66*

590. In the May 2017 IRA Status Report, Tighe & Bond also reported a lead concentration of 2 µg/L in a sample collected on September 26, 2013, a lead concentration of 2.6 µg/L in a sample collected on October 11, 2016, and an arsenic concentration of 7.2 µg/L in a sample collected on October 11, 2016 from the residential well at 77 H Foote Road.

591. 77 H Foote Road is located approximately one third of a mile east/northeast of the Landfill. It is the home of the Carlson family, Individual Plaintiffs in this case.

592. 77 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

593. A POET treatment system was installed at 77 H Foote Road on October 10, 2016.

594. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding chlorobenzene and arsenic concentrations in samples collected from the residential well at 78 H Foote Road in Charlton:

¶ No.	Sample Date	Chlorobenzene Concentration (µg/L) MMCL = 100 µg/L	Arsenic Concentration (µg/L) MMCL = 10 µg/L
594a	9/26/14	0.5	2

595. 78 H Foote Road is located approximately one quarter mile northeast of the Landfill.

596. 78 H Foote Road is not currently receiving bottled water from Casella, SRDP, or the Town, nor does it have a POET treatment system.

597. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 81 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL= 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL= 70 µg/L
597a	9/18/12	--	2	2.7	2.2	1.7	0.7
597b	9/24/15	0.43	2.6	4.2	3.9	2.4	3.7
597c	10/28/15	0.47	1.7	2	2.5	1.7	2.6
597d	2/20/16	0.24	0.73	1.1	ND	0.66	1.2
597e	2/22/16	0.19*	0.84	0.56	1.1	0.63	1.2
597f	2/26/16	0.29*	0.79	0.7	1.2	0.68	1.3
597g	3/4/16	0.24	0.9	0.74	1.4	0.78	1.5
597h	3/11/16	0.193	0.91	0.83	1.4	0.84	1.5
597i	3/18/16	0.201	0.71	0.62	1.1	0.62	1.3
597j	4/28/16	0.163*	0.66	0.96	0.96	0.59	1.1
597k	5/24/16	0.321	1.2	1.4	2.3	1.3	2.3
597l	6/27/16	0.197	1	2.4	1.9	1.4	2.3
597m	8/3/16	0.324	1.5	3.2*	2.3*	1.4*	2.6*
597n	10/4/16	0.36	1.6	1.7	2.6	1.7	3.1
597o	10/19/16	0.249	1.3	1.7	2.2	1.6	2.7
597p	11/15/16	0.314	1.4	1.3	2.2	1.4	2.6
597q	12/14/16	0.307	1.6	1.7	2.4	1.5	2.8
597r	1/17/17	0.192	0.98	1.2	1.6	1.1	1.9
597s	2/14/17	0.174	0.66	0.24*	1.4	0.9	1.6

597t	3/15/17	ND	0.71	1	1.4	0.88	1.6
597u	4/14/17	0.155	0.77	0.77	1.2	0.77	1.4

598. In the May 2017 IRA Status report, Tighe & Bond reported the following testing information to DEP regarding toluene, benzene, and chloroform concentrations in samples collected from the residential well at 81 H Foote Road:

¶ No.	Sample Date	Toluene Concentration (µg/L) MMCL= 1000 µg/L	Benzene Concentration (µg/L) MMCL = 5 µg/L	Chloroform Concentration (µg/L) ORSG = 70 µg/L
598a	4/28/16	0.32*	ND	0.16*
598b	5/24/16	ND	0.67	ND
598c	10/4/16	ND	ND	0.24*
598d	10/19/16	ND	ND	0.15*
598e	11/15/16	ND	1.1	0.12*

599. In the May 2017 IRA Status Report, Tighe & Bond also reported a lead concentration of 2 µg/L and an arsenic concentration of 9 µg/L in samples collected on September 25, 2015 from the residential well at 81 H Foote Road.

600. 81 H Foote Road is located approximately one third of a mile east/northeast of the Landfill.

601. 81 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

602. A POET treatment system was installed at 81 H Foote Road on February 19, 2016.

603. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane detections in samples collected from the mid-point of the POET system – between the two granular activated carbon vessels – at 81 H Foote Road:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L
603a	4/14/17	0.147

604. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding chloroform concentrations in samples collected from the residential well at 82 H Foote Road in Charlton:

¶ No.	Sample Date	Chloroform Concentration (µg/L) ORSG = 70 µg/L
604a	4/12/17	0.14*

605. 82 H Foote Road is located approximately one third of a mile east/northeast of the Landfill. It is the home of the Breen family, Individual Plaintiffs in this case.

606. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 85 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL= 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL= 70 µg/L
606a	11/2/15	0.17*	ND	--	ND	ND	ND
606b	7/26/16	0.497	2.8	6.5	4.2	2.8	5
606c	8/18/16	0.558*	2.8	6.1	4.5	3	5

607. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding chloroform concentrations in samples collected from the residential well at 85 H Foote Road in Charlton:

¶ No.	Sample Date	Chloroform Concentration (µg/L) ORSG = 70 µg/L
607a	1/25/16	0.27*
607b	4/18/16	0.24*
607c	1/17/17	0.19*
607d	2/14/17	0.22*
607e	3/17/17	0.25*

608. In the May 2017 IRA Status Report, Tighe & Bond also reported an arsenic concentration of 2 µg/L in a sample collected on September 27, 2016 from the residential well at 85 H Foote Road.

609. 85 H Foote Road is located approximately one third of a mile east/northeast of the Landfill.

610. 85 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

611. A POET treatment system was installed at 85 H Foote Road on January 17, 2017.

612. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane, toluene, and chloroform concentrations in samples collected from the residential well at 86 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L	Toluene Concentration (µg/L) MMCL = 1000 µg/L	Chloroform Concentration (µg/L)
612a	9/26/14	0.13*	ND	ND
612b	11/2/15	0.1*	--	--
612c	12/21/15	ND	0.12*	ND
612d	1/18/17	ND	ND	0.18*
612e	2/14/17	ND	ND	0.24*
612f	3/13/17	ND	ND	0.23*
612g	4/14/17	ND	ND	0.22*

613. 86 H Foote Road is located approximately one quarter mile northeast of the Landfill. It is the home of Laurie Zanca, an Individual Plaintiff in this case.

614. 86 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

615. 86 H Foote Road does not have a POET treatment system installed.

616. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 89 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL= 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL= 70 µg/L
616a	9/25/14	0.26	0.9	ND	1.2	0.8	1
616b	11/2/15	0.35	1.2	--	1.7	0.92	1.5
616c	4/20/16	0.245	0.96	1.6	1.5	1	1.5
616d	7/25/16	ND	0.42*	0.72	0.66	0.40*	0.72
616e	9/12/16	ND	0.2*	0.32*	0.28*	0.2*	0.33*
616f	9/14/16	ND	0.18*	0.29*	0.31*	0.19*	0.3*
616g	9/19/16	ND	0.26*	0.4*	0.35*	0.23*	0.35*
616h	9/26/16	ND	0.57	0.82	0.76	0.48*	0.74
616i	10/10/16	0.307	0.98	1.6	1.5	0.96	1.5
616j	11/16/16	0.322	0.91	1.5	1.5	0.96	1.7
616k	12/13/16	0.271	1.1	1.4	1.8	1.1	1.9
616l	1/20/17	0.264	1.1	1.4	1.8	1.2	1.9
616m	2/14/17	0.288	0.9	1.5	1.8	1.1	2
616n	3/16/17	0.29	0.93	1.3	1.9	1.1	2.1
616o	4/12/17	0.235	0.88	1	1.7	0.93	1.8

617. In the May 2017 IRA Status Report, Tighe & Bond also reported an arsenic concentration of 6 µg/L in a sample collected on September 25, 2014 from the residential well at 89 H Foote Road.

618. 89 H Foote Road is located approximately one third of mile east/northeast of the Landfill.

619. 89 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

620. A POET treatment system was installed at 89 H Foote Road on September 5, 2016.

621. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and VOC concentrations in samples collected from the residential well at 90 H Foote Road in Charlton:

¶ No.	Sample Date	1,4- Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro -ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro- benzene Conc. (µg/L) MMCL= 100 µg/L	1,1- dichloro- ethane Conc. (µg/L) MMCL= 70 µg/L	1,1- dichloro -ethene Conc. (µg/L) MMCL = 7 µg/L	Cis-1,2- dichloro -ethene Conc. (µg/L) MMCL = 70 µg/L
621a	9/25/15	0.09*	ND	ND	ND	ND	ND
621b	10/28/15	0.14*	ND	ND	ND	ND	ND
621c	12/18/15	0.099*	0.39*	0.63*	0.57*	0.34*	0.47*
621d	2/4/16	0.18	0.65	1.1	1	0.61	0.97
621e	4/18/16	ND	0.11*	ND	ND	ND	ND
621f	8/17/16	ND	0.2*	0.22*	0.26*	0.14*	0.23*
621g	9/26/16	ND	ND	0.15*	0.15*	ND	0.16*
621h	10/20/16	ND	0.17*	0.23*	0.21*	0.13*	0.21*
621i	11/3/16	ND	0.28*	0.38*	0.39*	0.26*	0.24*
621j	11/4/16	ND	0.22*	0.45*	0.36*	0.25*	0.35*
621k	11/10/16	ND	0.27*	0.49*	0.48*	0.31*	0.24*
621l	11/17/16	ND	0.31*	0.56	0.42*	0.3*	0.45*
621 m	11/28/16	ND	0.29*	0.54	0.44*	0.28*	0.46*
621n	12/1/16	ND	0.29*	0.58	0.39*	0.27*	0.41*
621o	1/19/17	ND	0.32*	0.65	0.46*	0.32*	0.47*
621p	2/15/17	ND	0.31*	0.68	0.57	0.31*	0.55
621q	3/15/17	ND	0.38*	0.78	0.62	0.37*	0.72
621r	4/19/17	ND	0.46*	0.89	0.85	0.46*	0.81

622. In the May 2017 IRA Status Report, Tighe & Bond also reported an arsenic concentration of 4 µg/L in a sample collected on September 25, 2015 from the residential well at 90 H Foote Road.

623. 90 H Foote Road is located approximately one quarter mile east/northeast of the Landfill.

624. 90 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

625. A POET treatment system was installed at 90 H Foote Road on November 1, 2016.

626. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 91 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL= 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL= 70 µg/L
626a	9/26/13	0.08*	ND	ND	ND	ND	ND
626b	4/21/16	0.08*	ND	ND	ND	ND	ND
626c	12/15/16	ND	0.16*	0.15*	0.26*	0.14*	0.26*
626d	1/20/17	ND	ND	ND	ND	ND	0.12*

627. In the May 2017 IRA Status Report, Tighe & Bond also reported arsenic concentrations of 28 µg/L in a sample collected on September 26, 2013 and 25 µg/L in a

sample collected on September 26, 2016 from the residential well at 91 H Foote Road.

Both of these arsenic concentrations exceed the MMCL of 10 µg/L.

628. 91 H Foote Road is located approximately one third of a mile east/northeast of the Landfill.

629. 91 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

630. 91 H Foote Road does not have a POET treatment system installed.

631. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and CVOC concentrations in samples collected from the residential well at 93 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Conc. (µg/L) ORSG= 0.3 µg/L	Trichloro-ethylene Conc. (µg/L) MMCL= 5 µg/L	Chloro-benzene Conc. (µg/L) MMCL= 100 µg/L	1,1-dichloro-ethane Conc. (µg/L) MMCL= 70 µg/L	1,1-dichloro-ethene Conc. (µg/L) MMCL = 7 µg/L	Cis-1,2-dichloro-ethene Conc. (µg/L) MMCL = 70 µg/L
631a	11/6/15	0.09*	ND	ND	ND	ND	ND
631b	2/12/16	0.12*	0.29*	ND	ND	0.31*	0.53
631c	4/18/16	0.078*	0.18*	0.18*	0.27*	0.2*	0.29*
631d	9/26/16	ND	ND	ND	0.17*	ND	0.12*
631e	11/17/16	ND	0.34*	0.35*	0.5	0.32*	0.48*
631f	1/16/17	ND	0.26*	0.32*	0.45*	0.3*	0.43*
631g	2/15/17	ND	ND	0.23*	0.3*	0.13*	0.33*
631h	3/22/17	0.152*	0.27*	ND	0.42*	0.27*	0.4*
631i	4/18/17	ND	0.21*	0.27*	0.43*	0.24*	0.45*

632. 93 H Foote Road is located approximately one third of a mile east/northeast of the Landfill.

633. 93 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

634. 93 H Foote Road does not have a POET treatment system installed.

635. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding chloroform concentrations in samples collected from the residential well at 94 H Foote Road in Charlton:

¶ No.	Sample Date	Chloroform Concentration (µg/L)
		ORSG = 70 µg/L
635a	11/18/16	0.13*
635b	12/15/16	0.39*
635c	1/16/17	0.45*
635d	2/16/17	0.42*
635e	4/19/17	0.19*

636. 94 H Foote Road is located approximately one third of a mile east/northeast of the Landfill. It is the home of the Moberg family, Individual Plaintiffs in this case.

637. 94 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

638. 94 H Foote Road does not have a POET treatment system installed.

639. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane and chloroform concentrations in samples collected from the residential well at 95 H Foote Road in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L	Chloroform Concentration (µg/L) ORSG = 70 µg/L
636a	9/25/15	0.06*	ND
636b	10/28/15	0.13*	ND
636c	7/25/16	ND	0.37*
636d	9/26/16	ND	1.3
636e	10/26/16	ND	1.7
636f	11/17/16	ND	1.5
636g	1/16/17	ND	0.83
636h	2/17/17	ND	0.66
636i	4/12/17	ND	0.52

640. In the May 2017 IRA Status Report, Tighe & Bond also reported an arsenic concentration of 10 µg/L in a sample collected on September 25, 2015 from the residential well at 95 H Foote Road.

641. 95 H Foote Road is located approximately one third of a mile east/northeast of the Landfill. It is the home of the Hogan family, Individual Plaintiffs in this case.

642. 95 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

643. 95 H Foote Road does not have a POET treatment system installed.

644. In the May 2017 IRA Status Report, Tighe & Bond reported an arsenic concentration of 63 µg/L in a sample collected on September 25, 2014 from 98 H Foote Road in Charlton. This concentration is more than six times the 10 µg/L MMCL for arsenic.

645. 98 H Foote Road is located approximately one third of a mile north/northeast of the Landfill. It is the home of the Rauktis family, Individual Plaintiffs in this case.

646. 98 H Foote Road is receiving bottled water from Casella, SRDP, and/or the Town.

647. 98 H Foote Road does not have a POET treatment system installed.

648. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding 1,4-dioxane, lead, and arsenic concentrations in samples collected from the residential well at 5 Eleanor Lane in Charlton:

¶ No.	Sample Date	1,4-Dioxane Concentration (µg/L) ORSG = 0.3 µg/L	Lead Concentration (µg/L) MMCL = 15 µg/L	Arsenic Concentration (µg/L) MMCL = 10 µg/L
648a	9/26/13	0.04*	ND	5
648b	9/28/16	ND	3	9

649. 5 Eleanor Lane is located approximately one third of a mile northeast of the Landfill. It is the home of the Stern family, Individual Plaintiffs in this case.

650. 5 Eleanor Lane is receiving bottled water from Casella, SRDP, and/or the Town.

651. 5 Eleanor Lane does not have a POET treatment system installed.

652. In the May 2017 IRA Status Report, Tighe & Bond reported the following testing information to DEP regarding lead and arsenic concentrations in samples collected from the residential well at 10 Eleanor Lane in Charlton:

¶ No.	Sample Date	Lead Concentration (µg/L) MMCL = 15 µg/L	Arsenic Concentration (µg/L) MMCL = 10 µg/L
652a	9/26/13	3	10
652b	9/27/16	280	8
652c	10/24/16	2	ND